

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GERALD TINNER, individually,  
Plaintiff,

v.

SAN JUAN COUNTY, a municipal  
subdivision of the state of Washington,  
RONALD KREBS, in his individual and  
official capacity as San Juan County Sheriff,  
and STEPHEN PARKER, individually and  
in his official capacity as an employee of the  
San Juan County Sheriff's Office,  
Defendants.

No. 2:19-cv-00925-MJP

STIPULATED MOTION AND ORDER  
TO EXTEND DISCOVERY  
DEADLINES FOR LIMITED PURPOSE  
OF COMPLETING PLAINTIFF'S  
DEPOSITION

NOTE ON MOTION CALENDAR

Wednesday, June 24, 2020

**STIPULATED FACTS**

The parties to this suit have been cooperating on conducting a Zoom-based deposition for the past few weeks. The deposition of Plaintiff was commenced on May 19, 2020. During the deposition, Attorney Cooley dropped his surface tablet, which shattered and became inoperable. Attorney Cooley was working remotely and this was his only device for a Zoom deposition. The deposition was adjourned with agreement to re-schedule once counsel's computer was fixed.

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Motion to Extend Discovery Deadlines.docx

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1 There are four parties to this case, and party representatives who need to be  
2 coordinated for purposes of re-scheduling the deposition. Mr. Grellet-Tinner is unavailable  
3 for the month of July. Attorney Cooley will be attending his niece's wedding in Montana for  
4 part of August. The other lawyers and parties have complicated schedules. Given the  
5 complications of scheduling, the parties would ask that the court modify the discovery cut-  
6 off for this deposition from July 31 to September 3, 2020, the date all parties agree the  
7 remainder of the Grellet-Tinner deposition can be completed. .  
8  
9

10 Stipulated: June 24, 2020

KEATING, BUCKLIN & McCORMACK, INC., P.S.

11  
12 By: /s/ Andrew Cooley

13 Andrew Cooley, WSBA #15189

14 Kimberly Waldbaum, WSBA #31529

15 Attorney for Defendants San Juan County and Ronald  
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22 /s/ Nicolas Power (with permission)

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27 STIPULATED MOTION AND ORDER TO EXTEND  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED: June 24, 2020

2  
3 /s/ Andrew Cooley

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5 Kimberly Waldbaum, WSBA #31529  
6 Attorney for Defendants San Juan County and  
7 Ronald Krebs  
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14 **ORDER**

15 Based on the foregoing Stipulation, the Discovery Cut-off is continued to  
16 September 3, 2020 for the limited purpose of completing the deposition of Plaintiff. All other  
17 deadlines remain.

18 IT IS SO ORDERED.

19 DONE IN OPEN COURT THIS 24th DAY OF June, 2020.

20 

21 Marsha J. Pechman  
22 United States Senior District Judge

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